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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE GOOGLE PLAY STORE ANTITRUST LITIGATION

Case No. 3:21-md-02981-JD

THIS DOCUMENT RELATES TO:

**JOINT PROPOSED WITNESS LIST FOR
EVIDENTIARY HEARING ON CHAT
PRESERVATION**

Epic Games, Inc. v. Google LLC et al., Case No. 3:20-cv-05671-JD

Judge: Hon. James Donato

In re Google Play Consumer Antitrust Litigation, Case No. 3:20-cv-05761-JD

State of Utah et al. v. Google LLC et al., Case No. 3:21-cv-05227-JD

Match Group, LLC et al. v. Google LLC et al.,
Case No. 3:22-cv-02746-JD

Pursuant to the Court's order, *see* MDL Dkt. 375, 384, Plaintiffs and the Google Defendants ("Google") respectfully submit this joint proposed witness list for the evidentiary hearing on chat preservation scheduled for January 12, 2023.

Live Testimony

	Witness Name	Calling Party	Testimony Topics
1.	Genaro Lopez	Google	Use and operation of the electronic chat system, communication tools available to Google employees, applicable and potential alternative retention policies, and guidelines for chat content
2.	Jamie Rosenberg*	Google & Plaintiffs	<u>Google</u> : Use of chats and other communications methods <u>Plaintiffs</u> : Use of Google Chats and the extent to which efforts were taken to preserve Google Chats
3.	Lawrence Koh*	Google & Plaintiffs	<u>Google</u> : Use of chats and other communications methods <u>Plaintiffs</u> : Use of Google Chats and the extent to which efforts were taken to preserve Google Chats
4.	Tian Lim*	Google & Plaintiffs	<u>Google</u> : Use of chats and other communications methods <u>Plaintiffs</u> : Use of Google Chats and the extent to which efforts were taken to preserve Google Chats
5.	Andrew Rope	Google	Document preservation and legal hold implementation details, and details of collection/production in this case
6.	Ronald Schnell	Plaintiffs	Mr. Schnell is an expert who will testify about the evolution of instant messaging applications, including Google Chat, for business enterprises; the features and functionalities of Google Chat; and the ways in which Google could have easily preserved Google Chats for all litigation hold custodians

The parties have agreed that only two of the three witnesses designated with a () will testify in person at the hearing. In particular, Plaintiffs have requested that Google make Mr. Lim available for the hearing, but his status remains uncertain and so the parties are continuing to confer.

1 Respectfully submitted,

2 Dated: January 5, 2023

3 CRAVATH, SWAINE & MOORE LLP

4 Christine Varney (*pro hac vice*)
Katherine B. Forrest (*pro hac vice*)
Gary A. Bornstein (*pro hac vice*)
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12 By: /s/ Lauren A. Moskowitz
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14 *Counsel for Plaintiff Epic Games, Inc.*

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18 *Counsel for Plaintiffs Match Group, LLC*
19 *et al.*

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1 Dated: January 5, 2023

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10 Dated: January 5, 2023

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1 **E-FILING ATTESTATION**

2 I, Dane P. Shikman, am the ECF User whose ID and password are being used to file this
3 document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the
4 signatories identified above has concurred in this filing.

5 */s/ Dane P. Shikman*

6 Dane P. Shikman

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